

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA
CHARLESTON DIVISION**

IN RE: ETHICON, INC., PELVIC REPAIR SYSTEM PRODUCTS LIABILITY LITIGATION	Master File No. 2:12-MD-02327 MDL 2327
THIS DOCUMENT RELATES TO ALL CASES	JOSEPH R. GOODWIN U.S. DISTRICT JUDGE

**NOTICE OF ORAL AND VIDEOTAPED DEPOSITION DUCES TECUM
OF CHARLES W. NAGER, M.D.**

To: Defendant ETHICON, INC., and Johnson & Johnson, Inc

Please take notice that pursuant to Rule 30 of the Federal Rules of Civil Procedure that Plaintiffs, by and through their counsel, will take the videotaped deposition of Charles W. Nager, M.D. on June 10, 2014 at 9:00 a.m. at 9444 Medical Center Drive, La Jolla, CA 92093 as set forth in Schedule A. This deposition is being taken for the purposes of discovery and such other purposes as authorized by law. The deposition will be taken before a person authorized by law to administer oaths, pursuant to Federal Rule of Civil Procedure 28, and shall continue from day to day until completed. Said deponent will bring the documents referred to in Schedule B attached hereto.

Respectfully submitted,

/s/ Thomas P. Cartmell
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SCHEDULE B

1. All letters, e-mails, telecopies or other documents (including any attachments thereto) reflecting any communication that relates to this litigation and that was exchanged between Defendant manufacturers or any attorneys for or other agents for Defendants to the extent not already produced.
2. All letters, e-mails, telecopies, drafts, or other documents (including any attachments thereto) reflecting any communication that relates to the AUGS Position Statement on Mesh Midurethral Slings for Stress Urinary Incontinence.
3. A copy of your current curriculum vitae.
4. Any and all documents ever provided to you by Defendant manufacturers with regard to any of their products including but not limited to Directions for Use, Instructions for Use, patient brochures, marketing literature, sales literature, implantation videos, any and all correspondences between you and Defendant.

CERTIFICATE OF SERVICE

I certify that on June 4, 2014, I electronically filed this document with the Clerk of the Court using the CM/ECF system which will send notification of this filing to CM/ECF participants registered to receive service in this MDL.

Certified to the 4th day of June, 2014 by:

/s/ Thomas P. Cartmell